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October 31, 2014

Warden Zerillo
Queens Private Correctional Facility
182-22 150th Avenue
Jamaica, New York 11413

RE: United States v. Phillip Kenner
Docket No. 13-CR-607

Dear Warden:

Once again, I rely upon your professionalism and cooperation to facilitate my client's access to the vast amount of documents provided by the government on CD/DVD disks ("discovery materials") as he prepares for trial. Currently, we are engaged in pre-trial motion practice which requires that select documents be presented to the court as exhibits to the motion. In order to meet the pre-trial motion schedule presently set by the court and in anticipation of supplemental pre-trial motion submissions, it is necessary that my client's library hours be expanded to allow for the timely and thorough analysis of the discovery materials for inclusion as exhibits in the pre-trial motion stage of the litigation.

Presently, Phil is permitted time to review and analyze the discovery materials in the law library for one (1) hour each day of the week. For the reasons set forth above, it is requested that Phil be permitted to return to the law library following the afternoon shift change at 3:00 p.m. for late-afternoon/evening review of the discovery materials for an additional two (2) to three (3) hours daily. Of course, the officers following the 3:00 p.m shift change would need to be made aware of the additional law library time to effectuate the instant request.

Thank you for your anticipated attention to this request and, as always, do not hesitate to contact me directly if you or your staff have any questions.

Very truly yours,

Richard D. Haley

RICHARD D. HALEY

cc: Hon. Joseph F. Bianco via ECF
AUSA James Miskiewicz via ECF